

Appendix D

EPA Custom Monitoring Agreement Kewanee and Cleaver Brooks Boilers

T2-050413



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: AWT - 107

13 SEP 2005

Mr. Todd J. Hughes
Environmental Manager
Glanbia Foods Inc.
1728 South 2300 East
Gooding, Idaho 83330

Re: NSPS Subpart Dc Reduction in Fuel Use Record-keeping Request

Dear Mr. Hughes:

This alternative fuel monitoring determination is in response to a request sent to the Environmental Protection Agency (EPA) by Glanbia Foods Inc. (Glanbia) dated June 13, 2005. In this request, it is stated that Glanbia intends to maintain and operate two 25.13 MMBTU/hr boilers, located at their facility in Richfield, Idaho, fueled by propane exclusively. Boiler 1 is a Kewanee Classic III installed in May of 1992. Boiler 2 is a Cleaver Brooks installed in April of 1995. Therefore, these boilers are affected facilities subject to 40 CFR 60 Subpart Dc "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" (Subpart Dc) and also subject to certain general requirements of 40 CFR 60 Subpart A.

EPA approves the request from Glanbia for a reduction in the fuel usage record-keeping requirement in 40 CFR §60.48c of Subpart Dc from daily to monthly. EPA also approves the use of one gas meter to record monthly propane usage for both boilers as follows.

Background

Glanbia has requested to reduce the record-keeping requirement of 40 CFR §60.48c. Under this section owners or operators of each affected facility are required to record and maintain records of the amounts of each fuel combusted during each day.

Glanbia requests approval to record the amount of each fuel combusted in Boilers 1 and 2 during each month instead of during each day as required by Subpart Dc. Glanbia proposes to have one gas meter for Boilers 1 and 2 that will measure the total propane usage per month. There is no secondary fuel use in these boilers. When more than one boiler is firing propane simultaneously, they will divide each boiler design heat input capacity by the total of the design heat input capacities of each boiler, and use this to prorate the natural gas usage of each boiler on a monthly basis. EPA determines that this will adequately determine the fuel usage by each boiler.

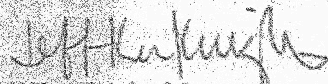
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Basis for approval

The approval for the reduction in the record keeping to monthly instead of daily is based on a memorandum dated February 20, 1992, from the EPA Office of Air Quality Planning and Standards which states that there is little value in requiring daily record-keeping of the amounts of fuel combusted for an affected unit that fires only natural gas or natural gas with clean low-sulfur fuel oil (sulfur content less than 0.5%) as a backup. EPA has approved requests for such units to maintain monthly, instead of daily, fuel records. As defined in the currently accepted definition of natural gas, from the Acid Rain Program, in 40 CFR Part 72, *Natural gas* means a naturally occurring fluid mixture of hydrocarbons (e.g., methane, ethane, or propane).

Therefore your request has been approved. If you have any further questions or concerns, please contact Heather Valdez of the Region 10 Office of Air, Waste and Toxics at (206) 553-6220 or valdez.heather@epa.gov.

Sincerely,



Jeff Ken Knight, Manager
Federal and Delegated Air Programs Unit
Office of Air, Waste and Toxics

cc: Bill Rogers, Idaho Department of Environmental Quality, Boise
Stephen Van Zandt, Idaho Department of Environmental Quality, Twin Falls